

In re Terrorist Attacks on September 11, 2001

As relates to: 03 MDL 1570 (GBD) (SN)

LAURENCE SCHLISSEL, et al.

Civil Docket Number: 18-cv-05331

PLAINTIFFS,

SECOND NOTICE OF AMENDMENT

v.

ISLAMIC REPUBLIC OF IRAN,

ECF CASE

DEFENDANT.

This document relates to:

Laurence Schlissel, v. Islamic Republic of Iran, No. 1:18-cv-05331 (GBD) (SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 5 (the “Underlying Complaint”), as permitted and approved by the Court’s Order of May 25, 2018, ECF No. 4010, read with the Order dated April 27, 2018, ECF No. 3982. Upon the filing of this Notice of Amendment, the Underlying Complaint is deemed amended to add the individuals listed below (the “New Plaintiffs”) as plaintiffs raising claims against the Islamic Republic of Iran, and adopting the factual allegations, jurisdictional allegations, and jury trial demand of the Underlying Complaint and *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53), as well as all causes of action specified below. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the Underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

CAUSES OF ACTION

The New Plaintiffs hereby adopt and incorporate herein by reference the causes of action set forth in the Underlying Complaint and the *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53).

New Plaintiffs are making such claim on the following basis, and incorporate by reference that supplemental information provided in the Identification of New Plaintiffs below, identifying the New Plaintiffs asserted basis for participating in this suit:

- ☐ Estate Wrongful Death Claim by Estate Representative on Behalf of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☒ Solatium Claim by Immediate Family Member of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☐ Personal Injury Claim by Individual Injured as a result of the September 11, 2001 Terrorist Attacks

IDENTIFICATION OF NEW PLAINTIFFS

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the Underlying Complaint discussing the decedent and/or the decedent's estate.


	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05331
88	Stephens Pyant, Brenda	GA	United States	Stephens, Edna L.	Sister	¶ 25
89	Stephens, Eddie	GA	United States	Stephens, Edna L.	Brother	¶ 25
90	Stephens, Mary L	GA	United States	Stephens, Edna L.	Sister	¶ 25

	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05331
91	Stephens Cobb, Barbara	SC	United States	Stephens, Edna L.	Sister	¶ 25
92	Stephens, Marvin	GA	United States	Stephens, Edna L.	Brother	¶ 25
93	Stoller, Glen	NJ	United States	Stoller, Stanford M.	Son	¶ 26
94	Stoller, Eric	NY	United States	Stoller, Stanford M.	Son	¶ 26
95	Shirolkar, Elina	NC	United States	Thatte, Harshad S.	Daughter	¶ 31
96	Kashetta, Sarah	NY	United States	Thompson, Brian T.	Daughter	¶ 32
97	Thompson, Daniel	NJ	United States	Thompson, Brian T.	Son	¶ 32
98	McKenzie, Giovanni	Japan	United States	Thompson, Vanavah	Sister	¶ 33
99	Traina, Salvatore	FL	United States	Traina, Christopher M.	Father	¶ 36
100	Sensing, Meghan	PA	United States	Van Hine, Richard B.	Daughter	¶ 38
101	Small, Emily	NY	United States	Van Hine, Richard B.	Daughter	¶ 38
102	Vola, Anthony	FL	United States	Vola, Maria P.	Brother	¶ 43
103	Wagner, Warren	TX	United States	Wagner, Karen J.	Brother	¶ 44
104	Estate of Mattie Wagner	TX	United States	Wagner, Karen J.	Mother	¶ 44
105	Wagner, Karl	MD	United States	Wagner, Karen J.	Brother	¶ 44
106	Waisman, Armando	NY	United States	Waisman, Gabriela	Father	¶ 45
107	Waisman, Marta	NY	United States	Waisman, Gabriela	Mother	¶ 45
108	Wald, Alexandra	MD	United States	Wald, Victor	Daughter	¶ 46
109	Wald Spielman, Daniella	NJ	United States	Wald, Victor	Daughter	¶ 46

	New Plaintiff's Last Name, First Name	State of Residency at Filing (or death)	Citizenship/ Nationality on 9/11/2001	Decedent's Name (alphabetical by last name)	New Plaintiff's Relationship to Decedent	Paragraphs of Complaint Discussing Decedent 1:18-cv-05331
110	Watson, Gary	NY	United States	Watson, Kenneth	Son	¶ 48
111	Watson, Christopher	NY	United States	Watson, Kenneth	Son	¶ 48
112	Watson, Glenn	NY	United States	Watson, Kenneth	Brother	¶ 48

Dated: June 28 2018

Respectfully submitted,



 Jerry S. Goldman
 Anderson Kill P.C.
 1251 Avenue of the Americas
 New York, New York
 Telephone: 212-278-1000
jgoldman@andersonkill.com
 COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on June ~~4~~⁴, 2018, I caused the foregoing Notice of Amendment, to be served via the Court's ECF system to all counsel of record in Case Number 03-MDL-1570 (GBD) (SN).



Jerry S. Goldman